

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	JUDGE JOHN R. ADAMS
	)	
Plaintiff,	)	CASE NO. 1:18 CR 619
	)	
v.	)	
	)	<u>GOVERNMENT’S SENTENCING</u>
JAMEL WILLIAMS,	)	<u>MEMORANDUM</u>
	)	
Defendant.	)	
	)	
	)	

The United States, by and through Justin E. Herdman, United States Attorney, and Assistant United States Attorney Ranya Elzein, respectfully submits this memorandum setting forth the United States’ position regarding sentencing for Defendant Jamel Williams (“Williams”). For the following reasons, and for those to be articulated at the sentencing hearing, the United States respectfully submits that a sentence within the applicable United States Sentencing Guidelines range is appropriate.

On December 18, 2018, Williams plead guilty, pursuant to a plea agreement, to the Indictment charging him with ten counts of Passing or Uttering Counterfeit Obligations or Securities, in violation of 18 U.S.C. § 472. PSR ¶¶ 1–2, Doc. No. 14. Specifically, between November 28, 2015 and October 20, 2016, Williams passed a total of \$4000 in counterfeit bills during ten separate trips to local Target stores. *Id.* ¶¶ 22–30, 55, 88.

The government agrees with the Guidelines calculation in the Presentence Investigation Report (“PSR”) for this offense. The PSR assigned an offense level of 8 and criminal history category IV, resulting in a range of 10 to 16 months. *Id.* ¶¶ 30, 55, 88.

The nature and circumstances of the offenses and Williams’ history and characteristics support a within-Guidelines sentence, as they demonstrate Williams’ repeated disrespect for the law. Between 2002 and 2018, Williams sustained two drug-related convictions, seven convictions for driving under suspension, one importuning conviction for soliciting a female under thirteen years of age, two theft-related convictions, three domestic violence convictions, and five other minor convictions for transportation-related misconduct and not having a driver’s license. *Id.* ¶¶ 33–53. He has six pending charges for similar offenses, for all of which he has active warrants issued for failure to appear in court. *Id.* ¶¶ 51–56. Williams’ relatively short sentences for his convictions, the longest being six months, have been insufficient to rehabilitate him or deter him from continuing to engage in criminal activity. Indeed, Williams’ criminal history reflects a pattern of committing an offense, serving minimal to no jail time, and then committing the same or similar offense again. His actions in the instant case, using counterfeit money to purchase items from a retail store, are consistent with his prior behavior. Williams’ inability to correct his criminal behavior demonstrates his repeated disrespect for the law and a high likelihood of recidivism.

In sum, the nature and circumstances of the offense coupled with Williams’ history and characteristics counsel in favor of a sentence within the Guidelines range, as such a sentence is necessary to afford just punishment, promote respect for the law, and afford adequate deterrence to both Williams and others.

Respectfully submitted,

JUSTIN E. HERDMAN  
United States Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of March 2019, a copy of the foregoing document was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/ Ranya Elzein

Ranya Elzein  
Assistant U.S. Attorney